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ABSTRACT

These guidelines, funded under provisions of Title I of the Elementary and Secondary Education Act, have been prepared to assist school districts develop projects that will effectively achieve the objectives of the federal and state laws which relate to compensatory education. The appropriation for California under Title I is allocated to districts on the basis of the number of children from low-income families residing in each district. The project method is used in distributing the funds. The school district submits a project application to the state agency, indicating the proposed program for utilizing a certain sum of money to supplement the regular school program. The Education Code provides that the State Board of Education shall be the approving power for projects submitted by the school districts. The Equal Educational Opportunities Commission serves as the advisory board to the Board on matters relating to the coordination and implementation of effective compensatory education programs. The staff of the Division of Compensatory Education assists in designating target areas, selecting pupils, planning and developing curriculum to provide comprehensive compensatory education programs that will raise the achievement levels of disadvantaged pupils, developing programs for staff development, and evaluating the success of individual school programs and of the entire project. The approval process requires in-depth analysis of the entire project, including fiscal management, program development and implementation, evaluation, and community involvement. (Author/JM)

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Guidelines: COMPENSATORY EDUCATION

1973 EDITION

THE ELEMENTARY AND SECONDARY EDUCATION ACT OF 1965
TITLE I – PUBLIC LAW 89-10

Prepared by the
Division of Compensatory Education
California State Department of Education

Approved by the
State Board of Education
December, 1972

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FOREWORD

Education, as a word, comes to us from the Latin meaning *to rear.* And I do not believe that meaning has changed. Education still means preparing pupils of any age – of whatever background – of varying abilities – to become contributing members of society. Even more importantly, however, education means helping our children to learn to think and reason creatively and positively. That is our job.

The word *compensatory* also comes from Latin, and it means to make up for a loss. Thus, compensatory education means helping children from disadvantaged backgrounds overcome certain deficiencies. It is based on a commitment to a new definition of equal educational opportunity.

Traditionally, educators and the public have spoken of equal educational opportunity in terms of sameness – the same textbooks, the same curriculum, the same class size, the same number of library volumes. We have held on to the myth that we were doing an equally good job with all our children, that all the schools were equal, that they all provided a similarly good education, and that aside from disciplinary problems, nothing was wrong with our schools in the ghetto. In other words, if the children failed, something was wrong with the children.

But with compensatory education has come a new concept. We are being forced to recognize that equal educational opportunity means an educational program geared to the needs of each child – a program that will give each child an equal chance to succeed to the maximum extent of his potential, regardless of his economic, ethnic, social, or cultural background.

While we have traditionally thought of a dropout in terms of the child's failure to succeed in school, a more realistic appraisal is that dropouts reflect the school's failure to succeed with the child. In effect the child has not dropped out; he has been pushed out by a school that has ignored his educational needs and by a school program that had no relevance to his aspirations or learning poblems.

Consequently, there has been a strong correlation between a student's educational achievement and his socioeconomic background. Traditionally, the child from a disadvantaged background has achieved at a lower rate than his more affluent classmate. He

starts behind and falls further and further behind the longer he stays in school.

The problem is not new. What is new is the attention that is finally being given to the problem. Most of the students who are dropping out today would never have attended high school at all 50 years ago. They would have quit school before reaching the high school level and would have taken unskilled jobs, which were then readily available. They would not have been considered dropouts.

What is also new is that unskilled jobs are diminishing because of automation, and the schools have been called upon to play a major role in breaking the vicious cycle of illiteracy, poverty, crime, and dependency on welfare that is taking an increasing toll in human and economic waste.

Among the priorities of public education must be the improvement of school achievement of the children of the poor, the disadvantaged, the groups that in the past have failed to receive the full benefits of American education. That is the goal of compensatory education.

These guidelines have been prepared to assist the local educational agency develop projects that will be effective. They were prepared at the direction of the State Board of Education.

It is my hope that these guidelines will make your job easier. It is my greater hope that our compensatory education projects will continue to help us achieve for each child taking part in a project a better education than he would have received without such help.

Wilson Riles

Superintendent of Public Instruction

PREFACE

The major goal of the compensatory education program in California is to achieve a normal range and distribution of academic achievement for the target population as compared with the general population of California schoolchildren. To achieve this goal compensatory education projects must help strengthen the educational programs in the schools. Title I of the Elementary and Secondary Education Act provides for the establishment of supplementary educational programs for educationally disadvantaged children who live in low-income areas and attend public and nonpublic schools; or who are neglected and delinquent children in institutions and foster homes, delinquents in state-operated juvenile facilities, or resident pupils of state schools and hospitals.

The appropriation for California under Title I of the Elementary and Secondary Education Act (Public Law 89-10 as amended) is allocated to districts on the basis of the number of children from low-income families residing in each district. The project method is used in distributing the funds. The school district submits a project application to the state agency, indicating the proposed program for utilizing a certain sum of money to supplement the regular school program.

The Education Code provides that the State Board of Education shall be the approving power for projects submitted by the school districts. The Equal Educational Opportunities Commission serves as the advisory body to the Board on matters relating to the coordination and implementation of effective compensatory education programs. Local educational agencies are required to submit project applications, which are reviewed to determine that:

- The district has identified the children and schools most in need of help, and the proposal is designed to give them the help they need.
- There is sufficient opportunity for the participation of educationally disadvantaged children attending nonpublic schools and residing in the project areas
- Applications have been developed in cooperation with school district advisory committees and target school parent advisory groups, and these committees include representatives of other

community organizations and agencies concerned with the health and welfare of disadvantaged children and their families.

- District applications contain adequate fiscal information, and expenditures are justified.
- Federal funds have been used to supplement state and local funds, not to replace them.

The staff of the Division of Compensatory Education assists school districts in designating target areas, selecting pupils, planning and developing curriculum to provide comprehensive compensatory education programs that will raise the achievement levels of disadvantaged pupils, developing programs for staff development, and evaluating the success of individual school programs and of the entire project. The approval process requires in-depth analysis of the entire project, including fiscal management, program development and implementation, evaluation, and community involvement.

The Title I project application, signed by the local authorized agent and approved by the State Board of Education, becomes a legal contract between the Board and the district. In the contract the district agrees to meet the requirements and to provide for the activities or services specified in the approved application. In accordance with the obligations of the contract, each school district is responsible for establishing adequate procedures to monitor and supervise project operations in the target area schools.

These guidelines were prepared by the Division of Compensatory Education to help school districts develop projects that will effectively achieve the objectives of the federal and state laws which relate to compensatory education.

MANUEL V. CEJA
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Division of Compensatory Education

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1. Project Planning

To ensure optimum success in planning the total Title I project, the district should involve the widest range of talent available, both from within the district and from the community at large. Evaluations of previous project results should be considered as well as the current needs of the pupils to be served. Input from teachers, curriculum experts, fiscal personnel, parents, and evaluators provides valuable planning information.

All of the following steps are necessary to plan an Elementary and Secondary Education Act (ESEA), Title I, project:

- Identify Title I target areas.
- Conduct comprehensive needs assessment.
- Involve the nonpublic schools.
- Select target schools.
- Select project participants.
- Establish the school district advisory committee and target school parent advisory committee(s).
- Select staff members.
- Develop the program.
- Develop evaluation procedures.
- Provide for reports and dissemination of information.
- Comply with existing state and federal desegregation policies.

1.1 Identify Title I Target Areas

The purpose of Title I is to provide special educational services in attendance areas which have high concentrations of children from low-income families. The school district shall rank its attendance areas in order, beginning with those that have the highest concentrations of children from low-income families. All attendance areas in which the concentrations of poverty are at least as high as the average concentration of poverty in the school district shall be

ranked. No attendance area in which the concentration of poverty is below the district average may be designated as a "target area."

1.1.1. Bases for Ranking Attendance Areas

The bases on which the attendance area shall be ranked are family income data or other data reflecting severe poverty. In selecting source data for determining concentrations of children from low-income families, the primary source data, i.e., 1970 census data and/or Aid to Families with Dependent Children (AFDC) counts, shall be used. In some limited situations, secondary source data may be used when primary source data are not available or when children from low-income areas with high concentrations of families who qualify on the basis of secondary source data might be left out of a Title I program if the primary source data were used alone. Secondary source data include, but are not limited to, housing, health, free school lunches, employment statistics, and Internal Revenue Services information. When secondary source data are used, a means test by local survey of each child in public and private schools is required to determine income level and numbers of children. The data compiled from secondary sources must be shown to have a high correlation with primary source data. When primary and/or secondary source data are used, such data shall (1) be applied uniformly to all situations; and (2) avoid duplicating counts of children.

The attendance areas may be ranked by the percent or by the number of children from low-income families residing in the areas. The school district shall select the method of ranking which will most effectively provide for Title I services to children in areas of the highest concentrations of poverty. A combination of percent and numerical methods of ranking the attendance areas may be used in order to fulfill the purpose of Title I; however, in such a case the total number of attendance areas designated as target areas shall not exceed the number that would have been designated if only one method of ranking had been used.

1.1.2 Instructions for Ranking of Intermediate and Secondary School Levels

When a kindergarten through grade six (K-6) attendance zone or complex is served by both primary and intermediate schools (e.g., several preschool or K-3 schools and several 4-6 schools), all primary schools (preschool or K-3) shall be ranked separately from all intermediate schools (4-6). If the district in such an area chooses to serve other than primary schools, the intermediate schools may be ranked according to the number or percent of disadvantaged children

enrolled in the primary schools which feed into the intermediate schools.

Secondary schools in a unified school district shall be ranked on the basis of the number of project participants they receive from the K-6 target school attendance areas. Union high school districts shall rank their secondary schools on the basis of family income data rather than feeder patterns, since a union high school district generally serves more than one elementary school district.

1.1.3 Instructions for Ranking Attendance Areas in Districts That Have Desegregated

The consolidated application (Form A-127) shall cite the criteria by which the target areas were selected and ranked. Districts which have desegregated all or a portion of their school attendance areas shall rank the schools in accordance with the income data derived from primary or secondary source data for the families of the children who attend the desegregated schools. Once these data have been gathered, instructions under sections 1.1 and 1.1.2 shall be followed.

When the district governing board has redistributed the project population because of the closing of a previously eligible target school or schools, the redistributed population may or may not qualify for Title I services on the basis of sections 1.1.1 and 1.1.2 of these guidelines.

1.2 Involve the Nonpublic Schools

Federal law requires that the local educational agency (LEA) shall provide compensatory education services designed to meet the special educational needs of disadvantaged children residing in the districts and enrolled in nonpublic schools. Services for nonpublic school participants shall be comparable with those for children enrolled in public schools and shall be consistent with the number of educationally disadvantaged children in nonpublic schools and the nature and extent of their educational disadvantage.

Immediately after the target area is designated, the LEA shall contact the nonpublic school officials and continuously involve them in the identification of needs, the determination of objectives and activities, the establishment of selection criteria for children who will receive the benefits of the project, and the evaluation of the project.

1.2.1 Maximum Number of Project Participants

The maximum number of children in nonpublic schools who may be served by a Title I project should be approximately proportional

to the number of children enrolled in nonpublic schools who live in the target areas as compared with the total number of schoolchildren (attending both public and private schools) who live in each target area. The maximum number of children who can receive Title I services is determined by the amount of the entitlement of the school district. (See section 3.1.1.)

1.2.2 Evidence of Nonpublic School Involvement

In applying for Title I funds, the school district shall submit evidence that it has provided for the participation of eligible children enrolled in nonpublic schools.

1.2.3 Guidelines for Involving Nonpublic Schools

The following guidelines are to assist in the preparation of Title I projects:

- If the school district, with the concurrence of the Division of Compensatory Education, determines that it is not feasible to provide the project services to the children attending nonpublic schools at publicly controlled facilities, only services of a therapeutic, health, remedial, or welfare nature not normally provided by the nonpublic school may be rendered on nonpublic school premises. When services are rendered on nonpublic school premises, a description of the services and the budget must be included in the consolidated application (Form A-127).
- The arrangements for participation of children from nonpublic schools on public school premises shall be made so as to avoid the separation of children by religious affiliation.
- Title I funds shall not be used to pay nonpublic school teachers or to construct nonpublic school facilities.
- Equipment purchased with Title I funds may be placed in the temporary custody of nonpublic schools only when it is necessary for the successful implementation of the project. Title to and control over such equipment shall be retained by a public agency.
- Title I funds may be used to transport educationally disadvantaged children enrolled in nonpublic schools to public schools if it is determined that such transportation is necessary for the participation of such children in the project.
- Title I funds shall at all times be under the control of and be administered by a public agency. The public agency shall be responsible for ensuring that Title I funds are used for the purpose for which they are granted.

- The school district shall certify that the participating nonpublic school(s) has on file with the U.S. Office of Education an Assurance of Compliance (HEW Form 441) in accordance with regulations of the U.S. Department of Health, Education, and Welfare.
- The school district may enter into a cooperative agreement with another school district if (1) there are educationally disadvantaged children who reside in one district but attend a nonpublic school located in another district; or (2) there is no practicable way for the district to provide for the participation of the children residing in its district who are enrolled in nonpublic schools.

  Under such a cooperative agreeement, the school districts shall jointly provide educational opportunities geared to the needs of eligible children attending nonpublic schools and living in both school districts.

1.3 Select Target Schools

In unified school districts, priority in designating target area schools shall be given to elementary schools. A junior high or high school may be selected only after a comprehensive, longitudinal project from preschool or kindergarten through grade six is established for all eligible children at the eligible elementary schools. An exception may be made for projects in unified school districts where ongoing Title I activities at the secondary level have proven to be successful in raising student achievement level to reflect a normal range and distribution of academic achievement as compared with the general population of California schoolchildren.

All eligible children shall be served in the school ranked number one before children in the school ranked number two are served. The number of eligible children at each school site may be determined by following the instructions under section 1.4, entitled "Select Project Participants."

1.4 Select Project Participants

1.4.1 Criteria for Project Participation

To be eligible for participation in a Title I project, participants must meet the following criteria:

- They must be between the ages of three and twenty-one and must not have completed high school.
- They must be educationally disadvantaged. Educationally disadvantaged children are those in a particular school district who

> have the greatest need for special educational assistance in order that their level of educational attainment may be raised to that appropriate for children of their age. The term includes children who are handicapped or whose needs for special educational assistance is a result of poverty or cultural or linguistic isolation from the community at large.

1.4.2 Priority for Eligibility

In some cases Title I funds will not be sufficient to serve all eligible children in one elementary target school from preschool or kindergarten through grade six. When this is the case, the children in preschool, kindergarten, and grades one through three who have been identified as eligible shall be served first. Eligible children in all fourth, fifth, and sixth grades, in that order, shall be served next.

Not every child who fits the definition of an educationally disadvantaged child has the same level of educational deficiency. Consequently, although children shall be eligible to receive services of the Title I program if they achieve below the second quartile (50th percentile) on standardized achievement tests, priority shall be given to children who may be described as follows:

> Priority for Title I services shall be given to the most educationally disadvantaged children; i.e., those children whose basic skill scores on standardized achievement tests fall below the first quartile (25th percentile) and/or those who exhibit a different level of verbal functioning due to linguistic, social, cultural, or economic isolation.

Under no circumstances may IQ be used as a basis for determining eligibility of the project participant. Because trainable mentally retarded (TMR), educable mentally retarded (EMR), and educationally handicapped (EH) programs, as well as programs for the physically handicapped, receive substantial state support, Title I funds may only be used to meet the unmet educational needs of children in public schools who participate in these programs. Unmet educational needs are those needs that are determined as the result of a locally conducted comprehensive needs assessment in the component activities indicated in section 1.7.5.

1.4.3 Criteria for Selecting Nonpublic School Participants

Children attending nonpublic schools and residing in the designated target areas or in geographical areas reasonably coterminous with the target areas will be qualified to receive Title I services on the basis of educational disadvantage, not on the basis of economic

disadvantage. The same educational criteria used to select children in public schools for participation shall be used to select children in nonpublic schools.

When nonpublic school participants are selected from geographical areas reasonably coterminous with the target areas, evidence must be submitted to show that these children were chosen by applying the same eligibility criteria of educational disadvantage that were applied to children in public schools. Further, evidence must be presented that the inclusion of children from reasonably coterminous areas will not dilute the services available to children in the target areas.

1.4.4 List of Selected Title I Participants

School district personnel are required to identify and compile a list of all Title I participants who attend public schools. Nonpublic school personnel shall identify and compile a list of all Title I participants who attend nonpublic schools and shall make the list available to public school personnel assigned to provide Title I services for children enrolled in nonpublic schools. Legitimate costs of identifying eligible target area nonpublic school pupils for participation in Title I projects are to be borne by the project and shall be charged against funds available to serve such children. School districts should not use the list of project participants to group, isolate, or segregate educationally disadvantaged children. It is not necessary to report the names of the children to the Division of Compensatory Education, California State Department of Education.

1.4.5 Grouping of Project Participants

Disadvantaged children learn by their association with children who bring to the school situation a background of experiences different from their own. Attention should be given to the "hidden curriculum" by which the child learns from his association with others, such as peers, teachers, and administrators. Title I projects shall not label children, segregate racial and ethnic groups of children, or create a racial and ethnic imbalance in the Title I activities. Thus, Title I projects shall not (1) create special tracks for the educationally disadvantaged; (2) establish adjustment, pregrade, or junior grade classes for the educationally disadvantaged; or (3) physically isolate the Title I children from their classmates on a scheduled daily basis, except in the following instance. Based on the results of a comprehensive diagnostic assessment of pupil needs, children who are assigned to a regular classroom with the classroom teacher responsible for their instructional program may be moved to a physical location other than the regular classroom on a temporary

basis until the diagnosed need has been alleviated. Such an alternate physical location includes, but is not limited to, a reading laboratory, a mathematics laboratory, a bilingual-bicultural learning center, an intergroup education learning center, a diagnostic clinic, or similar facilities where the specific needs of the pupil may best be served.

1.4.6 Minimum Amount of Services

The number of target area schools and pupils selected for participation in Title I projects shall be limited so that each Title I pupil receives services amounting to at least $330 over and above the regular school services, regardless of whether the $330 is from Title I or from a combination of funding sources. Only those funds which the district can show are being used to finance a portion of the comprehensive compensatory education project may be counted toward the $330. Even when joint funding is used to support the compensatory education project (see section 2.3), the number of pupils receiving Title I services shall not exceed the number of pupils on which the Title I entitlement was based (see section 3.1.1).

1.5 Establish the School District Advisory Committee

1.5.1 Necessity of School-Community Coordination

Coordinated school-community resources which deal with the whole child and not solely his academic needs are necessary if the poverty cycle is to be broken and full educational opportunity is to be provided for every child.

These guidelines provide the necessary procedures pertaining to school-community coordination which the LEA shall follow when applying for Title I funds. Each project application shall indicate that the applicant has considered the timely suggestions and offers of coordination made by other public and private agencies, including community action agencies. In order to avoid a duplication of services and ensure the most effective use of Title I funds, each applicant LEA shall demonstrate that the services provided by other agencies are coordinated with the Title I services. Applicant LEAs shall, upon request, make their applications available to interested public and private agencies far enough in advance of their final formulation to enable such agencies to make meaningful offers and suggestions.

1.5.2 Levels of Advisory Groups

As the major means for bringing about the coordination of community resources, each LEA applying for Title I funds shall

establish a two-level advisory structure. The applicant LEA will establish a school district advisory committee(s) and, in addition, will establish a parent advisory group at each public school at which Title I participants are enrolled. Nonpublic schools which enroll children served by the project shall establish similar parent advisory groups.

1.5.3 Inservice Training for Committee Members

Costs for inservice training for members of school district advisory committees and target school parent advisory groups are a legitimate expense of Title I funds, and provision for such training should be included in the project budget.

1.5.4 Functions of the Committee in Project Planning

Before the project application is submitted by the LEA to the State Department of Education, the school district advisory committee should (1) assist and advise the school district in planning and developing the objectives and activities of the Title I project; (2) assist in mobilizing and coordinating community resources in a concerted attack on the problems of educationally disadvantaged children; (3) consider information which is available concerning the special educational needs of the children to be served and the various services which are available to meet those needs, and make recommendations to the school district concerning those needs which should be addressed through the Title I project or similar projects; and (4) review information available on the evaluations of prior Title I projects and be aware of the performance objectives by which proposed Title I projects are to be evaluated.

1.5.5 Certification by Committee Chairman

The chairman of the school district advisory committee shall certify that the committee has participated in planning the project. Such certification shall be a part of the consolidated application (Form A-127) and all requests for amendment or revision of the project (Form CE-3).

1.5.6 Participation of Parent Advisory Groups

Parent advisory groups are also to take part in planning Title I projects. They will make suggestions and recommendations to the school staffs and to the school district advisory committee relative to the needs of target school pupils for services and to the activities which will improve the Title I and other compensatory education endeavors.

1.5.7 Endorsement by Group Chairman

The chairman of the group shall endorse the group's participation in planning the project. Such endorsement shall be a part of the consolidated application (Form A-127).

1.6 Select Staff Members

The ratio of project staff members to the number of children to be served must be high enough to provide concentrated, individualized, and comprehensive services. Such staffing may involve both professional and paraprofessional classroom personnel. Parents of project participants, as well as volunteers with special skills, should be considered for selection as staff members who are needed to provide specified services.

1.6.1 Staff Commitment to Project Goal

Special recruitment efforts are necessary in order to ensure adequate staffing to achieve the objectives of compensatory education. In assuming the responsibility for project leadership, it is imperative that the district personnel reflect a basic belief in and a commitment to the goal of compensatory education. It is essential that all personnel selected for the project believe in the value of the project and its potential for making a difference in the educational achievement of the pupils. The Title I project shall include procedures for studying manpower needs and for conducting personnel evaluations that will facilitate the proper placement and utilization of project staff members.

1.6.2 Staff Responsibility for Project

It is recommended that school districts ensure that the Title I directors have direct administrative responsibility for project planning, implementation, and supervision. It is imperative that school districts with substantial Title I grants have a Title I project director who has line authority. Individuals responsible for Title I projects should be identified within the organizational structure of the district.

1.6.3 Qualifications for Staff Members

In selecting Title I staff members, priority should be given to teachers who have a record of successful teaching experience, who relate well to participating pupils, who have an understanding of the culture of poverty, and who are competent in teaching the assigned subject areas at the assigned grade levels. It is imperative that the

Title I staff members reflect the ethnic and racial diversity of the district population.

In order that the ethnic and racial composition of the project staff may be representative of the Title I population being served, an affirmative action hiring plan, with short- and long-term objectives, should be established. This plan should be part of a districtwide affirmative action program. Such a plan should be included as part of the Title I application, beginning with the 1972-73 school year, and should include the deadlines for meeting the specific short- and long-term objectives. The application should also include information on the ethnic and racial makeup of the Title I participants and staff (number of American Indian, black, Oriental, and so forth).

1.6.4 Promotion of Staff Members

The promotional opportunities for Title I staff members should be based on their effectiveness in the classroom, their ability to relate to children from diverse racial and ethnic backgrounds, and their ability to understand the needs of children from low-income families.

1.6.5 Reduction of Class Size and Use of Teacher Aides

Title I funds may not be used solely to reduce class size. However, the adult-pupil ratio in Title I projects may be reduced through the use of teacher aides, team teaching, or specialists. Teacher aides and auxiliary personnel should be recognized as part of the educational team and should function as team members rather than in the isolation of their specialties. They should participate in Title I inservice training activities.

Teacher aides whose salaries are funded through Title I must perform duties related to the Title I instructional endeavor, either by providing direct services to participating children or by performing services for teachers in order to allow those teachers time to provide additional assistance to the project participants. Direct assistance to the pupils by teacher aides must be over and above that which the pupils would normally receive from the teacher and must not substitute for pupil-teacher contacts.

Consideration should be given to the development of a "career ladder" for aides, with additional roles being defined as assistants to nurses, community coordinators, welfare and attendance personnel, and other regular staff personnel. Aides shall not be assigned to general administrative and clerical duties which are not created by the Title I project.

1.6.6 Recruitment of Teacher Aides

Aides shall be recruited actively from among residents of the target area; recruiting efforts for aides shall be conducted first within the attendance areas of the school they are to serve. In all cases priority should be given to residents who are parents of participating children. Personal interviews conducted by existing Title I staff shall be part of the selection process. Participation of the appropriate target school advisory group is encouraged.

Only tests which are validated to measure the qualifications required for Title I teacher aides shall be used. In no case may personnel procedures which may be viewed as discriminatory be used in selecting aides.

1.7 Develop the Project

Each project shall be of sufficient size, scope, and quality to give reasonable promise of substantial progress toward meeting the needs of educationally disadvantaged children. A school district which has an entitlement of $25,000 or less must provide for such a project through a cooperative effort. (See section 3.1.1-1.)

Each compensatory education project shall be tailored to meet the needs and to complement the strengths of the project participants. The focus of all instructional compensatory educational activities shall be the provision of an individualized instructional program. Individualized instruction is defined as the assignment of appropriate learning tasks to each child as determined by a comprehensive diagnostic assessment of his strengths and special educational needs. The staff of each selected Title I school, with the assistance of the target school parent advisory group, shall be involved in developing and planning the comprehensive compensatory education project in accordance with these guidelines.

In planning or modifying the district's project, any change should be based on evaluative data. These data should be related to the project at the individual school sites. Ineffective project activities must be modified or discontinued.

1.7.1 Provide Multiple Services

The intent of Title I is to raise the educational achievement level of pupils from low-income attendance areas to a level comparable with that of the general population of California schoolchildren. Therefore, a comprehensive project must ensure that each participant is the recipient of multiple services designed to meet his educational needs. The provision of a single service is usually insufficient to

compensate for the conditions which caused him to be identified as an educationally disadvantaged pupil.

1.7.2 Clarify Project Goal

The main goal of every Title I project shall be to increase the academic achievement level of all eligible project participants to reflect a normal range and distribution of academic achievement for the target population as compared with the general population. Enhancing pupil self-image, motivating the pupil to achieve, improving his health, and raising his aspirational levels are to be considered supportive objectives that must be attained in order to meet the project goal.

1.7.3 Formulate Terminal Performance Objectives and Process Objectives

The project application should include appropriate program objectives: performance objectives and process objectives.

A terminal performance objective, sometimes referred to as a product objective, is a statement which specifies the ultimate performance to be attained, the conditions under which it will be evidenced, and the time constraints placed upon it.

Process objectives may be defined as major activities that include the criteria for successful completion within a given context and time frame. All those activities leading to the successful accomplishment of a terminal performance objective may be stated as process objectives and may include specific instructional objectives, management objectives, and evaluation objectives.

1.7.4 Diagnose Pupil Needs

In designing an effective compensatory education project, the school district shall identify the strengths and special educational needs of the target population. After the participants have been selected, a diagnostic profile must be developed for each participating child. This profile should include the causes of the individual's particular learning problems, a prescriptive instructional program based on that child's individual needs, and periodic indicators of the pupil's progress. In developing the diagnostic profile, school districts should utilize diagnostic instruments that reflect the child's needs, including such factors as health problems as well as academic strengths and weaknesses.

Identified academic needs shall be ranked in order of priority by the school district. A project may be approved only if it is designed

to meet one or more of the most urgent academic needs that have been identified.

Historical data, both statistical and empirical, indicate a high positive correlation between the educational attainment levels of educationally disadvantaged children and the economic status of their families. Consequently, the educational needs of most disadvantaged children are similar. Planners of programs for educationally disadvantaged children should also be aware of data which indicate that the individual child has needs which are unique to himself. Both the group needs and individual differences of Title I participants should be taken into account when planning programs for disadvantaged children.

1.7.5 Develop Component Activities

Each proposal shall consist of six required components, which together compose a comprehensive compensatory education project. The Title I project shall focus on an instructional endeavor designed to reach the main goal of raising pupil achievement level. The Title I instructional endeavor shall consist of two basic components: (1) language development; and (2) mathematics. In order for participants' achievement levels to reflect the normal range and distribution of academic achievement as compared with that of the general population of California schoolchildren, their achievement in language development and mathematics should be greater than one month's progress for each month in the Title I project.

Instructional components may also include other subject areas, such as social sciences and science, after the language development and mathematics components have been developed.

Supportive components must be related to the basic components and designed to support them. Under no circumstances may a supportive component be evaluated solely by itself; it must also be evaluated in terms of its effect on the instructional components. Supportive components shall consist of the following: (1) auxiliary services; (2) intergroup relations; (3) parent involvement and participation; and (4) staff development. All identified project participants shall benefit from each of the six components as needed. However, participants would receive services of the auxiliary services component commensurate with their individually diagnosed needs.

In each of the components, the particular instructional approach and teaching strategy must be described on the consolidated application (Form A-127), and teachers must be trained to implement the curricular approach in each of the appropriate components.

Activities within the six components (language development, mathematics, auxiliary services, intergroup relations, parent involvement and participation, and staff development) shall be determined to meet the diagnosed needs of pupils.

Although the following paragraphs do not include all of the essentials in the development of the component activities, they do reflect concerns which must be considered.

1.7.5-1 Activities of the language development component. The causes for the individual pupil's particular learning and reading difficulties shall be diagnosed, and an instructional program shall be prescribed and implemented based on that pupil's individual needs. Reading specialists, teacher aides, resource people, and/or consultants shall be a part of the reading program. A plan for continuing staff inservice education shall be directed toward assisting teachers and teacher aides in achieving the objectives of the reading program. There shall be specific plans for continuous communication among all staff members, including the child's regular teacher, in implementing the individual child's instructional program in order to ensure optimum achievement. Pupils participating in the special reading activities should receive instruction on not less than four days a week, and the daily period should be long enough to accomplish the program objectives.

When warranted, enrichment experiences should be an integral part of the language development activities. Such items as study trips are essential for an activity's success but may not be considered as separated components or activities in the descriptions given on the project application. Only those enrichment experiences which can be specifically related to the needs of the participating pupils as evidenced by the selection criteria shall be included.

While Title I funds may be expended only for identified project participants, districts should develop enrichment experiences which provide for the cooperation, exchange of ideas, involvement, and participation of all subgroups within the school population.

Enrichment experiences must (1) be directed toward the objectives of the Title I project; (2) supplement, not supplant, district effort; (3) be confined to target area schools rather than spread across the entire district population; and (4) include procedures that will not dilute Title I funds, yet will avoid the isolation and segregation of the Title I children.

Special attention shall be given to the strengths of the pupils and parents in terms of their language and cultural heritage. Bilingual teachers and bilingual teacher aides shall be provided when meeting the needs of non-English-speaking children. These activities should

treat all the needs of the child that are related to his success in school and should provide for extensive involvement of parents and community resource persons.

1.7.5-2 Activities of the mathematics component. In order that activities for the mathematics component can be fully effective, special consideration should be given to selecting professional staff members who have specific training in mathematics. In addition there must be a staff development program specifically tailored to meet the needs of classroom teachers and teacher aides who will serve the project population. Each pupil's educational deficiencies in mathematics shall be diagnosed. Prescriptive intervention shall be applied to alleviate the deficiencies. The length of instructional time allocated to mathematics activities should be consistent with the diagnosed needs of the child.

1.7.5-3 Activities of the auxiliary services component. Auxiliary services include those supportive activities necessary to the success of the project participants in the instructional components. Counseling and guidance activities, attendance services, nutritional services, and health services are examples of auxiliary services. Every effort must be exerted to utilize other local, state, and federal sources for food, clothing, and health services in order that Title I funds may be used to focus upon the academic needs of the project participants. The National School Lunch Act and Medi-Cal services should be utilized in coordination with Title I funds. The use of Title I project personnel to provide liaison between the Title I project and other agencies which provide services to the Title I participants is an approvable expenditure of Title I funds. Auxiliary services are to be extended only to project participants who have been selected to receive the benefits of the activities in the instructional components.

1.7.5-4 Activities of the intergroup relations component. Intergroup relations activities should be designed to foster interaction between and among groups of children from different racial, cultural, and socioeconomic backgrounds. Intergroup relations activities may include, but are not limited to, desegregation and integration, planned human relations activities, ethnic studies, and pupil exchanges. When an LEA is participating in a desegregation effort, whether partial or districtwide, Title I funds may not be used for home-school transportation expenditures. Home-school transportation is deemed to be a district responsibility and should not be funded by Title I.

1.7.5-5 Activities of the parent involvement and participation component. A systematic plan for parent involvement and participation shall be part of the comprehensive project. The plan shall go beyond the employment of neighborhood and community aides and the use of required advisory committees and groups. It shall include specific plans for improving communications between the school and the poverty area community. Parent involvement and participation shall include activities designed to make parents aware of the school's instructional endeavors and their children's progress and to assist parents in helping their children in the learning process.

See section 3.1.7 regarding funding of parent activities.

A list of suggested activities for the parent involvement and participation component follows:

- Request parents to assist in the classroom one day a week.
- Provide baby-sitting and other services that will allow parents to visit class and to share their child's learning experiences.
- Meet with groups of parents in their homes.
- Assign a community coordinator or social worker to provide services that will meet the needs of pupils and their parents and to follow up those services.
- Schedule pupil-parent activities that will increase their mutual experiential backgrounds.
- Utilize parents as resource persons for specific activities.
- Encourage father-son and mother-daughter activities.
- Provide special instructional classes for parents.
- Develop a school which encourages parents of the community to meet on school premises for neighborhood, club, social, or recreational gatherings.
- Set up special instructional programs in neighborhood homes, churches, and other meeting places to meet specific needs of parents.
- Allow parents to contribute time and effort to improve the school's facilities.
- Assist parents and other persons in the community in seeking private, business, foundation, and federal funds to meet the needs of the child, the home, and the community.
- Share reports of pupil progress as well as evaluation findings with the parents.
- Establish a procedure by which teachers and other staff members can listen to the concerns of parents.
- Employ parents in positions in the project when such employment will enhance the project.

- Solicit parents and teachers to form panels that will be able to interpret the project, its activities, and its services to the community.

1.7.5-6 Activities of the staff development component. All personnel – i.e., certificated and paraprofessional – who have contact with project children in any way or who work on the project must participate in the inservice education activities. A description of the staff development activities shall be included in the application for Title I funds even if the staff development activities are funded by non-Title I sources. The staff development component shall emphasize the improvement of instruction in specific areas by training staff members to diagnose learning needs, to prescribe and implement an instructional program, and to evaluate continuously the effectiveness of the program.

Staff development must be planned as a series of ongoing activities rather than as a single one-time activity and must be tailored to meet the needs of the project staff. Planning for staff development should involve those persons who are to participate in order to ensure that the content is practical and is related to the needs and interests of the participants. Special provision must be provided for training teacher aides in the skills needed for their jobs. When aides are assigned to classrooms, joint staff development activities are required for the aides and teachers.

The following content areas shall be included in the staff development component:

- Specific instructional skills related to the objectives of the project
- The dimensions of poverty and its effect on children
- Attitudes of teachers and their relationship to the learning process
- Intergroup and intercultural understanding
- The development of effective ways of incorporating curricular innovations which are necessary for a curriculum that is relevant to the needs of the project participants

1.7.6 Develop Activities for Preschool Projects

The Division of Compensatory Education encourages participating Title I districts to develop preschool projects as a part of an articulated early childhood education plan. These projects must follow the *Guidelines for Compensatory Preschool Educational Programs.*[1]

[1] *Guidelines for Compensatory Preschool Educational Programs.* Sacramento: California State Department of Education, 1969.

1.7.7 Develop Activities at the Secondary School Level

Projects at the secondary school level must include activities designed to make students aware of the relevance of skills basic to meeting future requirements for education and employment. Secondary compensatory educational activities should be designed to provide an opportunity for educationally disadvantaged students to participate in the mainstream of the secondary curriculum. Title I projects shall not be approved in secondary schools that create specific tracks or ability groups for the educationally disadvantaged. Students shall be helped to recognize the range of educational opportunities that are available to them. Whenever possible, academically oriented projects should be coordinated with opportunity projects conducted at institutions of higher education, and students should be provided with specific assistance so they will take advantage of such opportunities. For the student who will be seeking employment immediately after graduation, there should be basic information and skill development with respect to job finding, employer-employee relationships, work attitudes, and sources of continued job training and education. For the student who may continue his education, information should be provided about scholarships, special programs, and services at institutions of higher education.

1.8 Develop Evaluation Reporting Procedures

Federal and state laws require evaluation of compensatory education projects. Plans for an adequate evaluation must include provisions for developing reports for three groups: (1) project staff; (2) citizens in the school district; and (3) state and federal administrative agencies. In order to plan the following year's program, the project staff needs by early spring information regarding the relative effectiveness of procedures currently used. Citizens in the school district should have a yearly accounting of compensatory projects in terms of the effectiveness of the projects in meeting the special educational needs of disadvantaged children in public and nonpublic schools. The appropriate state agency requires information regarding the increase in educational opportunities offered by the project and the gains in pupil performance that are associated with language development and mathematics.

Evaluation shall be an integral part of the project. No project will be approved unless a specific evaluation design and associated procedures and responsibilities are specified. When the school district is unable to provide qualified staff necessary to the implementation of evaluation, the Division of Compensatory Education strongly

recommends that consultative services be obtained, a performance contract be drawn, and the resulting contract be approved by the Bureau of Evaluation and Research, State Department of Education. Title I funds may be used to obtain the technical and consultative assistance required. The use of outside consultant services in no way relieves the district of its responsibility in the implementation and reporting of an annual evaluation, including meeting deadline dates required by the state. The evaluation design should include both process and product evaluation. By means of process evaluation, the LEA will report on how well the program specifications are being implemented and the degree to which the activities contribute to meeting the objectives. By means of product evaluation or terminal performance evaluation, the LEA will report the degree to which the project objectives were reached. In summary an adequate evaluation design must: (1) specify the objectives; (2) describe the activities necessary to the accomplishment of each objective; (3) specify the instruments to be implemented in the evaluation; (4) specify data management and treatment; (5) summarize the findings and recommendations; and (6) identify the person responsible for implementation of the evaluation design. The design should provide for evaluation of each of the funded components.

1.9 Provide for Reports and Dissemination of Information

Each application by an LEA for a grant under ESEA, Title I, shall include specific plans for disseminating information. Items to be disseminated should include the general provisions of Title I and the applicant's past and present Title I programs, including the evaluations of such programs. The information should be available to parents and to the general public. The full text of current and past Title I applications, all pertinent documents related to those applications, evaluations of the applicant's past Title I projects, all reports required to be submitted to the state educational agency, and such other documents as may be reasonably necessary to meet the needs of parents or other members of the public must be made available upon request. The information should relate to the comprehensive planning, operation, and evaluation of the Title I program. It should not include information relating to the performance of identified children and teachers. Such dissemination plans shall include provision for the reproduction, upon request, of such documents free of charge or at reasonable cost (not to exceed the additional costs incurred which are not covered by Title I funds) or provisions whereby persons requesting such copies will be given adequate opportunity to arrange for the reproduction of such documents.

All project applications shall include a description of the procedure for selecting and disseminating information to teachers, administrators, and other persons or agencies involved in the development of compensatory education projects. The information will make available to school districts the latest educational developments and experiments for use in project planning and operation. The dissemination of evaluation data should be addressed to the State Department of Education, members of school district governing boards, administrators and staff members, community advisory groups, and parents. Costs of printing and disseminating information are legitimate project expenses.

The school district is required by federal regulations to furnish free of charge to each member of the district advisory committee, parent advisory groups, and nonpublic school officials the following: (1) copies of Title I of the Elementary and Secondary Education Act, and the federal regulations, guidelines, and criteria issued pursuant thereto; (2) state Title I regulations and guidelines; and (3) the LEA's current application. The district shall also make available to each such committee such other information as they may need for effective involvement in the planning, development, operation, and evaluation of the Title I project, including prior applications and evaluation reports. Inventory lists of equipment purchased with Title I funds and proposed and prior project budgets will be provided as needed.

The LEA shall also provide the district advisory committee and parent advisory groups with any plans for future Title I projects and programs, together with a description of the process of planning and developing them, and a time line indicating when the various steps in the process will start and be completed.

Title I staff members should be available for consultation with advisory committee members. The district advisory committee shall be informed in writing of all job openings in the Title I program and should communicate this information to the appropriate target school advisory groups.

1.10 Comply with the Integration Policy

School districts that submit Title I project applications must comply with the integration policy adopted by the State Board of Education, which follows:

> The McAteer Act of 1965 provides that compensatory education programs shall not "sanction, perpetuate or promote the racial or ethnic segregation of pupils in the public schools."
>
> The Elementary and Secondary Education Act of 1965 requires that a school district receiving federal compensatory education funds sign an

agreement to comply with the Civil Rights Act of 1964. The Civil Rights Act states that no person shall on the grounds of race, color or national origin be "excluded from participation in, be denied the benefits of, or be subjected to discrimination" under any federally funded program.

Compensatory education is not a substitute for the desegregation and integration of the schools. Whenever possible, plans for compensatory education and integration shall be coordinated and implemented at the same time.

The State Board of Education on several occasions has affirmed its policy against de facto segregation and in favor of integrated educational experiences for all children. The Board has declared: ". . . this challenge to equality of educational opportunity must be met with the full thrust of our legal authority and moral leadership . . ." The policy statement continued, ". . . in all areas under our control or subject to our influence, the policy of elimination of existing segregation and curbing any tendency toward its growth must be given serious and thoughtful consideration by all persons involved at all levels . . ."

The State Board of Education has recognized that segregation is one of the fundamental factors contributing to the educational deprivation of disadvantaged children. In addition to having adopted broad regulations implementing its policy on desegregation and integration, the Board has adopted specific guidelines regarding school integration in the use of compensatory education funds. These guidelines are summarized below:

1. Where concentrations of minority disadvantaged children exist within a school system, it is imperative that opportunities for remedying the negative effects of segregation be included in the planning and development of compensatory education programs.
2. A school district's application for Title I funds shall include a statement as to the effect that the proposed project will have, if any, on patterns of segregation in the schools in the district. The district shall, in the statement, explain the extent to which it has addressed the problem of de facto segregation and what actions are proposed to alleviate it.
3. Compensatory education funds may be used to advance school integration in the following ways:
   a. Funds may be used to facilitate preparation for integration when related to services for target area children.
   b. After the integration process has started, Title I funds may follow children to the new schools insofar as these schools become eligible in accordance with guidelines sections 1.1.1 and 1.1.2.
   c. Funds may be used for planned visitation and exchange programs involving children from the target area.
   d. Funds may be used for enrichment experience for Title I pupils in districtwide art exhibits, science fairs, field days, and student government activities.
4. Compensatory education funds may not be used to meet requirements of a specific desegregation plan, whether voluntary or court ordered.

2. Project Operation

2.1 Use of Advisory Groups

2.1.1 School District Advisory Committee

The school district shall establish a school district advisory committee to bring about the cooperation and coordination of community resources.

2.1.1-1 Relationships of the committee with other groups. The school district advisory committee should provide for the coordination and cooperation of parents, organizations, and agencies for the benefit of disadvantaged children. It should assure the school district that comprehensive plans are developed to take advantage of community resources, as well as state and federal funding sources, to ensure the most effective use of Title I funds. The advisory committee shall work with the school staff to develop recommendations for compensatory education projects. The committee shall report at least annually to the governing board of the school district on the progress of these projects.

The school district shall make such arrangements and initiate such procedures as are necessary to ensure that the advisory committee has adequate opportunity to communicate directly with the governing board of the school district and to assure the advisory committee that the board will consider suggestions and recommendations.

2.1.1-2 Functions of the committee. School district advisory committees are advisory in nature. These guidelines shall in no way be construed as giving any advisory committee veto power over Title I projects or activities.

The principal functions of the school district advisory committee are as follows:

- Assist and advise the school district in planning, developing, and implementing the Title I project(s).
- Assist in mobilizing and coordinating community resources in a concerted attack on the problems of educationally disadvantaged children.
- Consider information which is available concerning the special educational needs of the children to be served and the various services which are available to meet those needs and to make recommendations to the school district concerning those needs which should be addressed through the Title I project or similar projects.
- Review information available on the evaluations of prior Title I projects, and be aware of the performance objectives by which proposed Title I projects are to be evaluated.
- Assist in the overall planning, development, implementation, evaluation, and dissemination of information relative to the objectives and activities of compensatory education projects of the school district.
- Act as a hearing board for any individual or group that may want to propose additions to or changes in the school district's compensatory education projects.

2.1.1-3 Composition of the committee. Because the needs and resources of school districts differ, the exact composition of the advisory committees and the number of members of the committees will differ from district to district. The composition and size of the committee should be consistent with the size of the district, the number of schools involved with the Title I project, and the number and types of organizations and agencies in the community with which coordination and liaison are needed to ensure the most effective use of Title I funds. Committee members shall be selected in accordance with the provisions contained in these guidelines. Advisory committee members shall be appointed by the governing board of the school district.

The minimum standards for composition of the school district advisory committee are as follows:

- Of the total membership of the committee, more than a simple majority shall be parents of children who are project participants, including, where applicable, parents of participating children who attend nonpublic schools and parents of children in Title I preschool projects. Parent members of the committee shall be nominated for service on the committee by the parent advisory group in each target school. They shall be members of the group

making the nomination and may not be employees of the school district. The number of representatives to be nominated by each group shall be determined by the school district.

- The remaining members of the committee shall be recommended to the governing board by the appropriate groups or organizations represented and shall include: (1) representatives of the school district staff, including administrators, teachers, and other certificated personnel, and noncertificated personnel, such as clerks or aides who may or may not be parents of participating children; (2) representatives from nonpublic school agencies responsible for the education of disadvantaged children, such as private and parochial schools, settlement houses, or migrant labor camps, including those which operate preschool projects in the target areas; (3) representatives of organizations and agencies in the community, such as community action agencies or groups, and civic, business, labor, parent-teacher, and ethnic or religious organizations; and (4) representatives of other public health or welfare agencies that provide services to disadvantaged children or families.

The membership of the district advisory committee shall be reviewed at least annually after the project participants have been selected, and such changes in membership as are necessary to maintain the required majority of parents of project participants will be made in accordance with the preceding standards. Whenever changes in the membership of the committee occur, addenda to the project application shall be submitted correcting the membership list on file with the Division of Compensatory Education.

2.1.1-4 Organization of the committee. The school district advisory committee shall, at least annually, elect such officers as are necessary for conducting its meetings and performing its functions. The chairman of the committee may not be an employee of the school district. The committee shall adopt such bylaws and regulations governing the conduct of meetings and performance of functions as it deems necessary, providing the bylaws and regulations are not in conflict with these guidelines, federal laws, or state laws.

2.1.2 Target School Parent Advisory Groups

Parental involvement at the school level is deemed to be an important means of increasing the effectiveness of Title I projects. Each applicant local educational agency (LEA) shall involve the parents of the children to be served by the Title I project in the planning, development, operation, and evaluation of the project. At

each school in which Title I activities will be implemented, a target school parent advisory group shall be established as a major means for bringing about parental involvement at the school level.

2.1.2-1 Composition of the target school parent advisory group. The parent advisory group in each target school shall be composed of parents of children receiving the Title I project services and a representative of the school staff.

Parent members of the target school parent advisory group shall be selected by the parents of the children who will be served by the Title I project, including Title I preschool projects where they exist. Parent members shall be chosen by a democratic process from among the parents of participating children.

The representative of the school staff in the target school parent advisory group shall be appointed by the school district. This member should be the target school principal or other school employee empowered to plan compensatory education activities in the target school.

The number of members in the parent advisory group at any target school shall be determined by the school district and shall be consistent with the size of the school, the number of children who will participate in project activities in the school, and the duties and functions of the group.

The membership of each target school parent advisory group shall be reviewed at least annually after the project participants have been selected, and such changes in membership as are necessary to maintain the specified number of parents of participating children in the group shall be made in accordance with the procedures set forth in these guidelines. Whenever changes in membership of the target school parent advisory groups occur, addenda to the consolidated application (Form A-127) shall be submitted correcting the membership lists on file with the Division of Compensatory Education.

2.1.2-2 Functions of the target school parent advisory groups. Target school parent advisory groups shall work with the staff of the target school and other parents in the target area to assess the special educational needs of the children to be served in the target school. They shall make suggestions and recommendations to the school staff and to the school district advisory committee relative to the needs of target school pupils for services and for activities which will improve the Title I and other compensatory education projects. They shall assist the school staff in evaluating the effectiveness of these projects.

Each target school parent advisory group shall at least annually nominate the members of the group who will represent them on the school district advisory committee. The number of representatives is to be determined by the school district.

No employee of the school district may represent the parent advisory group on the school district advisory committee. However, parents who are also school employees may serve on the school district advisory committee as representatives of the school district staff.

Each designee from a parent advisory group to the school district advisory committee shall serve as the spokesman for the target area parents on the school district advisory committee and shall receive instructions from the parent advisory group regarding recommendations and suggestions to be brought to the committee.

The target school parent advisory group shall serve as a hearing board to which parents and school staff members may bring suggestions or complaints regarding the Title I services in the target school.

2.1.3 Advisory Groups in Cooperative Projects

In the establishment of the advisory structure for cooperative projects (see section 3.1.1-1), the entire project area shall be treated as one school district. The LEA shall establish one school district advisory committee for the project. Members on the committee shall represent the target areas included in the project. Cooperating school districts will establish target school parent advisory groups in accordance with these guidelines. These groups shall function as do target school parent advisory groups in single district projects.

In cooperative projects where school districts are so widely separated geographically that it is deemed impossible to implement the advisory structure described in these guidelines (see section 1.5.2), deviations from the provisions of these guidelines as are necessary to bring about a functional advisory structure for such cooperative projects may be made through mutual agreement between the administrating LEA and the Division of Compensatory Education. The concurrence of the governing boards of all cooperating school districts or their authorized representatives is required.

2.2 Length of Operation

2.2.1 Dates of Project Application and Project Length

The California State Department of Education, Division of Compensatory Education, will establish annually the appropriate

date for the submission of project applications. This date will be selected to facilitate the orderly review and recommendation by the Department of Education and the approval of the application by the California State Board of Education prior to the implementation of the project. Effective with the beginning of the 1973-74 fiscal year, no Title I funds may be used for project activities by LEAs without the prior approval of the California State Board of Education.

Each year the California State Department of Education will establish a cutoff date for the submission of applications. After the cutoff date funds not requested may be reallocated to other district projects.

ESEA, Title I, compensatory education projects may be funded over a 14-month period. All projects are to operate during the regular school year. The funding date of a project is determined as the date of approval of an application by the California State Board of Education. The ending date of a project is normally August 31 of the following year.

2.2.2 Daily Involvement

All project participants shall be involved daily in activities of the basic instructional components. Activities of the supportive components shall be available to the project participants frequently enough to ensure that the children's needs are being met and the performance objectives are being achieved. (See section 1.7.5.)

2.2.3 Summer School and Extended Day Projects

Evaluation data indicate that compensatory education activities of short duration have little if any impact on the achievement of the project population. Therefore, summer school expenditures are not encouraged, except for those activities which will lead to staff development or refinement of ineffective Title I activities. Whether or not these two activities involve Title I participants is at the district's discretion. Should children be involved in these activities, the district is encouraged to involve as many prekindergarten children as possible. (See section 3.1.6.)

2.2.4 Longitudinal Requirements

Because of the severe educational disadvantage of many children in the compensatory education program, it is recognized that project participants may require several years of continuing compensatory education. All project participants, beginning with preschool or kindergarten, shall remain in the compensatory education project

until it can be substantiated that their educational attainment is appropriate for children of their age. It is recommended that project participants remain in the project for a minimum of three years, but this does not preclude their being served in the program for a longer period to ensure that their level of educational attainment will continue at the level appropriate for children of their age.

The project shall be articulated with compensatory preschool educational projects, whether funded from Title I or other sources. All children with compensatory preschool educational experiences must be identified and included in a comprehensive compensatory education project.

2.3 Coordination with Other Funding Sources

Title I services may be enriched by coordinating them with services made available by other sources of funds. Such coordination can be especially helpful in funding auxiliary and other supportive services. The emphasis of the Title I project should be on instructional activities unless the other funding sources restrict the use of the funds to instructional activities.

Sources for joint funding may include, but are not limited to, the Elementary and Secondary Education Act, Titles II, III, VI, VII, and VIII; Education Professions Development Act; Economic Opportunity Act, Title II (which includes Project Head Start and Follow Through); National Defense Education Act; National School Lunch Act; Miller-Unruh Basic Reading Act; Model Cities Program; Children's Centers; State Preschool Program; and other federal and state laws relating to compensatory programs.

When funds other than Title I funds are used for compensatory education, they must be coordinated with a comprehensive compensatory education project and be focused upon the objectives and activities of the approved Title I project.

2.4 Categorical Use of Title I Funds

Title I funds, being categorical in nature, are intended to supplement, not supplant, other federal, state, and local funds. This policy is set forth in the federal regulations pertaining to Title I[1] and in the assurances which applicant agencies sign when they submit their project applications. Districts must not reduce expenditures of state and local funds and supplant those funds with Title I funds.

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[1] *Compilation of Legislation on Title I – Financial Assistance to Local Educational Agencies for the Education of Children of Low-Income Families (reflecting the 1966, 1967, and 1970 amendments), Elementary and Secondary Education Act of 1965.* Washington, D.C.: U.S. Department of Health, Education, and Welfare, 1971, p. 10.

2.4.1 Maintenance of Effort

No payments may be made to an LEA unless the combined local and state fiscal effort for the preceding fiscal year was not less than the combined fiscal effort for that purpose for the second preceding fiscal year. Any reduction in fiscal effort by more than 5 percent will disqualify that LEA unless that agency is able to demonstrate satisfactorily that such reduction was occasioned by an unusual event, such as the removal of a large segment of the tax rolls, that could not have been anticipated or reasonably compensated for by the local agency.

2.4.2 Comparability

In accordance with the provisions of Public Law 91-230, Section 109; and Federal Register, Volume 36, No. 199, Part II, Section 116.26, each school district that receives ESEA, Title I, funds must report annually on comparability. This report must attest to the fact that the school district is providing services from state and local resources at the ESEA, Title I, schools which are comparable with the services maintained in the average non-Title I schools of the district.

The concept of comparability is based upon the premise that an equitable distribution of resources and services should be made to all schools of a district, Title I target area schools and nontarget area schools alike. Such resources and services should be provided from state and local funds in such a manner that all children within a school district receive comparable educational opportunities.

The Comparability Status Report (Form CE-200) must be submitted each year to the California State Department of Education. Should an LEA report a lack of comparability according to the established criteria, a report of actions taken to correct the problem must be made so that the district is comparable at the time school starts in September.

The State Department of Education may not approve an application or authorize the release of ESEA, Title I, funds to an LEA unless the comparability report has been filed and approved by the State Department of Education.

LEAs are required to retain for a period of three years "back-up" materials used to compile the Comparability Status Report. The State Department of Education or agencies of the federal government may review or audit all data concerning comparability.

2.4.3 Personnel

All personnel employed in the project on a full-time basis must perform Title I tasks only. Tasks that are the legal responsibility of the school district shall not be assigned to full-time Title I personnel.

2.4.3-1 Funds for established positions. Federal funds shall not be used to pay all or part of those expenses which an LEA would have incurred if it were not participating in a Title I project. Compensation to supervisorial personnel, including superintendents of schools, directors of instruction, supervisors of instruction in regular curriculum areas, and building principals, falls within the category of expenses that would have been incurred if the district were not participating in the project. Such administrative staff members who are under contract at a fixed salary do not have fixed hours of employment and thus respond to the demands of the position without regard to hour or day. They are not to receive additional compensation for the duties that they perform in the administration of projects under Title I.

2.4.3-2 Funds for new positions. When it is clearly shown that the implementation of a Title I project has resulted in the creation in whole or in part of new positions, that portion of the new position relating to Title I activities may be supported from Title I funds. Approved Title I salaries shall follow the district's salary schedule and shall not augment an existing salary. Title I staff shall receive all rights and benefits afforded other district personnel.

2.4.3-3 Documentation for part-time positions. Personnel working in the administrative offices, such as clerks or secretaries, may receive a portion of their salaries from Title I funds if they are required to work beyond their usual hourly assignment or to occupy a newly created position that is needed to perform the clerical and secretarial duties for Title I projects. There can be no federal financial participation in overhead costs which are arrived at on a straight percentage basis. Such overhead costs may be allowed as can be documented and substantiated as directly related to the project. Supporting documentation for entries in the accounting records at the local level is very important. With Title I the prorating of employees' time may be a special problem. The proration of employees' salaries to more than one project is a "must" for those employees who are not assigned full time to one approved project. Such proration must be based on the amount of time an individual actually devotes to the approved project. The proration must be documented by a before-the-fact statement of the time estimated

that each employee will devote to the project and an after-the-fact statement of the actual time the person did devote to the project.

The documentation must be signed by the responsible official. The signed documentation must be available at the time of audit to support claims for part-time personnel in the Title I project. The total amount of time prorated among the various federal-state activities to which a staff member is assigned will not exceed 100 percent of the time of such staff member.

2.4.4 Consultative Services

Use of Title I funds is restricted to services which cannot be obtained from within the district, the State Department of Education, or the office of the county superintendent of schools charged to provide support for the district. Contracts with private consultants or agencies must be described in the project application.

It is recommended that any consultant who is a full-time employee of another public agency – e.g., state college or university, office of the county superintendent of schools, or school district – be required to certify as a part of the consultant agreement that such consulting activity does not conflict with the policy of the major employer. Payment may be questioned if the total outside employment of the consultant is in excess of the policy of the agency for which the person is employed full time.

Districts seeking consultative services will in all probability find suitable persons or firms in their communities or immediate areas. Contracting with consultants or firms from outside the area usually entails additional expenses and difficulties and is to be avoided.

The district is accountable for the full performance of contracted services.

2.4.5 Construction of Facilities

Construction shall be consistent with overall state plans for construction of school facilities. Contractors and subcontractors shall comply with federal policies regarding wage and fringe benefits and nondiscrimination in employment. It is assumed that the California Fair Employment Practices Act fulfills the requirements of federal nondiscrimination policies.

2.5. Equipment and Capital Outlay Expenditures in Title I Projects

Equipment and other capital outlay items purchased with Title I funds must relate to the objectives and activities of the Title I project and must meet the following criteria:

- The proposed item is necessary in terms of implementing the compensatory education program.
- The proposed item will have a beneficial effect on the achievement of the project population. In addition this portion of the justification must be correlated with the past evaluation results of the district's compensatory education program.
- The cost benefit of the item proposed, i.e., the cost per participant, is justifiable in accordance with the number of students who will receive the benefits of the item of equipment, or the cost per staff member must be justified in terms of benefits derived by the project population if the item is for use by the project staff.
- The equipment and other capital outlay items are labeled as having been purchased with Title I funds. Effective July 1, 1972, the month and year of purchase shall be noted on this label.

2.5.1 Receipt of Equipment

All equipment and supplies for a project must be received by August 31 or the ending date of the project.

2.5.2 Utilization of Equipment

Equipment purchased with Title I funds since the inception of the program in 1965 shall be assigned to Title I funded projects. In instances when it is necessary to remove Title I projects or staff from a school or from certain grade levels, the LEA is responsible for the transfer of equipment into operating ESEA, Title I, projects. Equipment may not be used in nonoperating projects or regularly with nonproject participants.

2.5.3 Disposition of Equipment

Any surplus equipment will be disposed of through existing district policies for disposal of surplus equipment with the prior written concurrence of the Division of Compensatory Education. Income from the sale of such equipment will be returned to the state agency for proper credit to be given to the appropriate federal fund.

2.5.4 Title to Equipment and Maintenance of Equipment Inventory

Title to equipment acquired under the ESEA, Title I, program, including that equipment temporarily located on private premises for use in approved compensatory education projects, is vested in and retained by the LEA. However, the federal government retains a vested interest in all ESEA, Title I, equipment as long as the program

remains in the district or until the equipment is disposed of or becomes obsolete, as described below. The LEA must make reasonable provision for the maintenance and repair of such equipment.

- Inventories shall be maintained on all items of equipment obtained by an LEA under this program since 1965. This inventory shall be established according to standard district procedures as specified in the California Education Code, Section 17199, and recommended in the *California School Accounting Manual.*[2] Such equipment must be used for purposes within the approved scope of the project, as specified in the guidelines, for the useful life of the equipment. The labeling of all ESEA, Title I, equipment is required.
- Under certain conditions surplus equipment may be sold or exchange before the expiration of its useful life with prior written approval from the Division of Compensatory Education, California State Department of Education. All receipts from such sale or exchange must be returned to the state agency and items identified by project year of purchase so that proper credit can be given to the appropriate federal fund.
  Obsolete or fully depreciated equipment may be processed for removal from ESEA, Title I, inventories according to standard district procedures. Official notification to the Division of Compensatory Education of such action will provide the proper documentation for future audit purposes.
- Inventory records shall be maintained on all equipment until the LEA is notified by the Division of Compensatory Education that title to such equipment has been given to the district.
- A complete copy of the LEA's total existing Title I inventory must be maintained and readily available for examination.

2.6 Revisions and Amendments of Projects

Districts are expected to carry out the objectives and activities as approved on the consolidated application (Form A-127). Alterations in the project during the school year should be minimal and must be approved by the Division of Compensatory Education, State Department of Education.

If the LEA is unable to perform services as approved or if it is inadvisable to do so, a revision of the project application must be submitted. A revision is a modification of the program of a

[2] *California School Accounting Manual* (1971 edition). School Business Administration Publication No. 8. Sacramento: California State Department of Education, 1971, pp. IV-2 – IV-5.

previously approved project which does not increase or decrease the total funding for the project. A revision may be requested to transfer funds for performance of other services. Such services should not be initiated prior to receipt of the written approval of the revision request.

An amendment is an application for unused funds to which the district is entitled, or it is a modification which increases or decreases the amount of funds of a previously approved project.

The procedure for applying for amendments and revisions to projects is similar to the procedure used in making an application. The LEA shall complete the request for amendments or revisions (Form CE-3), a new project budget page from the consolidated application (page 10, Form A-127), a line item budget breakdown of all new expenditures, and the justification statement required by Form CE-3.

A request for project modification may be approved only when evaluation data indicate that changes are needed to improve the effectiveness of the project, when the funding level of the approved project is increased or decreased, or when surplus funds have been generated which can be used for project improvement or summer school projects.

An identification of what constitute changes in a project which must be approved follows:

- A completely new project that replaces fully or partially a previously approved project
- A summer school project
- A change in personnel that increases, descreases, or substitutes personnel
- A change in objectives that expands or modifies objectives of the project
- A reduction, deletion, expansion, or extension of approved services, activities, materials, supplies, equipment, or facilities

2.7 Evaluation Procedures

The major goal of the compensatory education program in California is to achieve a normal range and distribution of academic achievement for the target population as compared with the general population. To achieve this goal the educational projects must help strengthen the educational programs in the schools.

Evaluation has as its major purposes verification of program success and identification of program elements needing improvement. It is therefore necessary that the program processes be evaluated so that terminal results can be attributed to specific

activities. Program process may be defined as the use of all resources and activities necessary to the accomplishment of the program objectives, including specific learning tasks, personnel, materials, and management. Some major activities are discussed for each of the six mandated components in section 1.7.5. The major activities specified for each component must include performance criteria so as to enable adequate process evaluation. In general, major activities will (1) be necessary to the achievement of project objectives; (2) be discrete and measurable (or verifiable); and (3) require specific educational resources.

2.7.1 Evaluation of the Instructional Components (Language Development and Mathematics)

Each of the instructional components, language development and mathematics, must include objectives and related major activities.

Whereas information regarding objectives and major activities may be adequate for reporting to local citizens and state agencies, such data are often too general to be useful to the project staff in making whatever planning changes are necessary to increase the effectiveness of the project. It is often helpful to separate test score data for groups of pupils who received different kinds of instruction under different staffing patterns or who used different types of materials. In addition project personnel may wish to know what effect a single instructional program has upon different kinds of pupils; i.e., the effects of the instructional program on pupils whose primary language is other than English.

Suggested procedures and techniques for evaluation of the instructional components include the following:

- An appropriate form and level of a standardized achievement test must be used for pre- and post-testing of pupils. (The Division of Compensatory Education will furnish a list of such tests upon request.) The state testing program, in some cases, can provide some of the required data. Data should be presented to indicate the magnitude of gains in reading and mathematics for the current participants compared to the average gains in prior years. Further, the range and distribution of pupil performance should be compared with the performance of the general population of California schoolchildren.
- Learning objectives are required in all compensatory projects as part of their individualized teaching strategy. Criterion-referenced tests which measure pupil success in meeting these objectives offer a rich source of data for developing more effective projects.

- Standardized and nonstandardized tests or scales which measure attitudes and perceptions are another source of data which can be used to improve programs.
- A topology of pupil characteristics should be available as a source of information that may be used in prescribing individualized instruction.
- The records kept by instructional staff may contain data indicating variations in instructional treatment; i.e., what learning materials and what personnel were used with specific pupils.
- Questionnaires constructed and field tested in accordance with recognized standardized procedures are often useful in measuring attitudes of pupils, parents, and staff.
- All survey techniques need to be planned in advance in order to measure the effectiveness of the project in meeting its objectives.

2.7.2 Evaluation of the Supportive Components (Auxiliary Services, Intergroup Relations, Parent Involvement, and Staff Development)

The evaluation suggestions presented in section 2.7.1 also apply to the evaluation of each supportive component. Evaluation rationale should indicate the relationships among components' objectives, major activities, and improvement in academic achievement.

The supportive components must have clearly defined objectives and clearly described activities designed to meet the objectives. The objectives and activities should be related to the performance of pupils, parents, and staff. For example, an objective for a staff development component might state the degree to which teachers will implement individualized instruction in the classroom, thus improving pupil learning opportunities. The accomplishment of the component objective could be evaluated by the degree to which the learned techniques for individualizing instruction were implemented in the classroom, thereby affecting the performance of pupils.

There are many techniques and procedures for evaluating the effectiveness of supportive components. Some of the more common include questionnaires, checklists, rating scales, and summarized anecdotal records. In addition to their use with pupils, such instruments should be utilized to gain information from instructional staff, parents, and community advisory groups.

The evaluation design requires reports of effective and ineffective activities, including recommendation for changes in project activities.

2.8 Records and Reports (Including Copyrights)

2.8.1 Record Retention

Project records shall be kept intact and accessible for at least three years after the close of the fiscal year in which the funds were expended. If a federal audit has not occurred within the three-year period, records will be maintained until such an audit has occurred or for five years after the close of the fiscal year in which the funds were expended.

Records involved in any claim or exception must be retained until final adjustment has been effected.

2.8.2 Copyrights

The general policy of the federal regulations is that materials produced with Title I funds shall not be copyrighted but shall be placed in the public domain. However, the regulations allow copyrighting for a limited time period when the agency receiving federal funds can show that the copyright will promote the effective development of materials and dissemination of information.[3] Requests for exception to the general copyright policy for material produced with state administered grants should be directed to the State Department of Education.

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[3]*Copyright Program Information*. U.S. Office of Education. Washington, D.C.: U.S. Department of Health, Education, and Welfare, 1971, p. 13.

3. Fiscal Management

The Elementary and Secondary Education Act of 1965 requires fiscal control and fund accounting procedures to ensure specified use and accounting of federal funds. A school district shall be responsible for the fiscal control and accounting of its allocation of funds.

3.1 Funds for Projects

Guidelines for administration of the funds for Title I projects follow:

3.1.1 Calculation of Entitlements (Including Cooperative Projects)

Each year Title I entitlements are calculated for local educational agencies (LEAs). Every eligible school district will be notified by letter of the maximum authorized amount and the ratably reduced amount to which it is entitled. (See section 3.1.1-2 for definition of ratably reduced amount.) In the absence of a congressional appropriation, the Division of Compensatory Education, California State Department of Education, may estimate entitlements for use by LEAs in submitting their project applications.

School districts must submit project applications yearly to use their Title I entitlements. Persons responsible for preparation of the applications should be familiar with the most recent edition of these guidelines for compensatory education. School district business offices should review budget pages to ensure proper classification of proposed expenditures before the project application is submitted to the Division of Compensatory Education. At least one copy of the application submitted to the Division of Compensatory Education must bear original signatures.

Entitlements for LEAs are calculated on the basis of the number of children in families receiving Aid to Families with Dependent

Children (AFDC) who reside in each school district. The January AFDC payroll of the county welfare department is to be used for determining these data. County superintendents of schools will arrange with county departments of welfare for release and processing of AFDC payroll information. School districts should budget an appropriate amount of their Title I funds to defray costs to the office of the county superintendent of schools for collecting these AFDC data.

Each year instructions for the collection of AFDC data will be forwarded to offices of county superintendents of schools and school districts, and meetings will be held in counties as necessary to complete arrangements for processing data. Entitlements for use in projects for institutionalized neglected and delinquent children shall be based on the number of children certified for such institutions by the U.S. Office of Education.

3.1.1-1 Management of cooperative projects. School districts with an entitlement of $25,000 or less must join a cooperative project in order that a comprehensive compensatory education project for eligible children in the districts can be developed and implemented. In counties in which the Title I entitlement for districts in the county totals $25,000 or less, all districts eligible in the county for Title I projects must enter into a countywide cooperative project.

The Division of Compensatory Education may grant permission to a school district to implement a separate project if the division determines that the school district's participation in a cooperative project would be impossible or impractical because of distance or geographical isolation.

A cooperative project is considered to be a single Title I project which is subject to the same guidelines for project activities as are single-district projects. Children participating in a cooperative project shall receive comprehensive compensatory education services. The selection of target schools shall be by district; i.e., the school(s) with the highest concentration of low-income families within each district shall be selected.

The administrative agency, with the cooperation of other participating districts, is responsible for the development and implementation of the cooperative project. Each participating district shall submit to the administrative agency the data needed to develop the Title I project design, prepare the consolidated application (Form A-127), ensure implementation in accordance with the approved

application, and prepare the annual evaluation report. Participating districts may revise and/or amend the project design only with the consent and approval of the administrative agency.

Participating districts shall reimburse the administrative agency for administrative services in connection with the project. The amount of reimbursement shall not exceed 5 percent of each participating district's entitlement.

3.1.1-2 Ratably reduced amount of maximum authorization. The maximum authorized amount is the amount the district would receive if Congress were to provide full funding by appropriating the amount required by the formula for determining the amount of the Title I grant to the state.

Since Congress has never appropriated the maximum authorized amount, each entitlement is reduced to bring the funds for the project within the amount appropriated. This amount is called the ratably reduced amount. Ratably reduced means that the entitlement has been reduced by a rate or percent of the maximum authorized amount. This is the amount of money available for funding Title I project activities.

Each LEA will be notified by the State Department of Education of its maximum basic grant and of its ratably reduced amount available.

3.1.2 Funding Date

The funding date of a Title I project is the date on which the project application is received by the Division of Compensatory Education in substantially approvable form or the beginning date of the project, whichever is later. Title I funds may not be used to pay obligations incurred prior to the funding date. It is advantageous to the district to establish July 1 as the beginning date of the project.

3.1.3 Cash Advances

Cash can be advanced only for projects which have been approved by the State Board of Education. To expedite the processing of cash advances, payments are scheduled to provide sufficient cash to meet only current accounts payable. The amounts to be paid are divided equally among the payments unless the district requests a variance based on projected needs. Funds are not to be advanced by the state agency so as to exceed reasonable balances for the current district needs.

3.1.4 Obligation of Funds

The final payment for a previously reported obligation must be completed before the end of the second fiscal year following the ending date of the project year.

There may be no federal financial participation in such costs extending beyond this period, except in the case of construction costs for which the nature of the construction will determine the length of the payment period.

An obligation of funds is regarded as an expenditure; there should be written documentation for each fund obligation. For a project ending August 31, obligations may be incurred until that date. Obligating documents for construction may be issued later than August 31, but they must be executed within a reasonable time, depending on the nature of the project.

3.1.5 Joint Project Funding

With permission of the Division of Compensatory Education, Title I funds may be used simultaneously with funds from other sources to provide joint financial support for an educational project. (See section 2.3.) In such arrangements funds from each source shall be used to support distinct and separate activities of the project to avoid the commingling of Title I funds with funds from other sources.

3.1.6 Summer Schools

Summer schools require approval pursuant to California Administrative Code, Title 5, Education, sections 11470 through 11474. Title I funds used to finance a summer school project shall be in addition to fully utilized state monies apportioned on the basis of average daily attendance. Districts which conduct a summer school should ensure that proper records are maintained to indicate clearly that Title I expenditures for summer school are in addition to local and state support.

Title I summer school expenditures shall be drawn from the entitlement for a single project year. For example summer school for June, July, and August of 1974 must be included in the budget for fiscal year 1973-74. This procedure will apply in succeeding fiscal years.

3.1.7 Parent Activities

Expenses incurred as a result of parents participating in parent involvement activities are considered as appropriate expenditures in the Title I program. The justification for these expenditures of Title I

funds for parent involvement is twofold: (1) they become the means of facilitating parent group activities; and (2) they enable parents to avoid the hardship that would occur if the expenditures were not authorized. However, expenditures of ESEA, Title I, funds for parent involvement purposes must be included in the approved project, and proper documentation must be available to justify each expenditure.

Some examples of parent involvement items which may be paid out of ESEA, Title I, funds are:

- Tuition, registration fees, and per diem for workshops and conferences
- The costs of providing meeting facilities, equipment, or supplies for parent meetings
- Expenses incurred by the LEA in connection with visits by parents to Title I schools
- Expenses incurred by parent council members while involved in council activities (Such expenses may include transportation costs to and from council meetings or provision of baby-sitting services.)

It is critical that each LEA clearly identify the necessary expenses for parent activities in the project application and adequately budget for these activities. It is also important that prior to embarking on a parent involvement activity, each parent should have a positive understanding of allowable claims which may be submitted to the district for reimbursement. In a general way parent involvement activities should focus on the child, the school, and the school district, with training activities limited to the local region. The local school board and district administration are expected to provide the same prudent judgment in approving all authorizations for parent involvement under Title I that the district would use in authorizing the use of other financial resources of the district. It is recommended that parent involvement activities be entered in the project budget under account classification 292, Miscellaneous Expenses of Instruction.[1]

3.2 Transfer of Funds

3.2.1 Budget Transfers

The Division of Compensatory Education is aware that project budgets must be based on estimates. Minor transfers among budget

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[1] *California School Accounting Manual* (1971 edition). School Business Administration Publication No. 8. Sacramento: California State Department of Education, 1971, pp. II-26 – II-27.

classifications may be made by the LEA if there is no change in the approved project as described in the application (Form A-127). When a change in the project requires an adjustment of the budget, a request for amendment or revision (Form CE-3) must be submitted.

3.2.2 Carry Over of Funds

Title I funds may be used in approved projects during the fiscal year following the fiscal year for which the funds were appropriated. Carry-over funds are an extension of the previous year's funding and must be accounted for separately from current year funds.

A request for project revision or amendment (Form CE-3) must be submitted to the Division of Compensatory Education for approval in order to carry over funds to be used in conjunction with a new project.

Carry-over funds should be obligated and expended as early as practical and, when feasible, in advance of the obligation and expenditure of funds appropriated for the succeeding fiscal year.

3.2.3 Reallocation of Funds

Subject to authorization by the U.S. Commissioner of Education, funds for which application was not made may be reallocated to other LEAs in amounts not to exceed the maximum authorized amount for each agency. Amounts shall be distributed to districts which have the greatest needs to redress inequities inherent in, or mitigating hardships caused by, the application of the provisions whereby the determination and allocation of entitlements are made. The needs and amounts to which districts shall be eligible for reallocated funds shall be determined when the entitlement fails to reflect actual needs due to population shifts, changing economic conditions, or other reasons.

The State Department of Education will set dates by which LEAs must submit applications. If the Department does not receive an application by the set date, it will request the LEA by letter to release formally funds to which it is entitled. If, after a reasonable period, no release or request for waiver has been received, the state agency will declare such funds to be available for reallocation.

3.3 Accounting for Funds

3.3.1 Procedures

Records of Title I income and expenditures shall be kept separately from the other fiscal transactions and records of a school district.

Title I projects need not be included in the annual budget of school districts. As the district receives approval for each compensatory education project, the governing board of the school district shall proceed in accordance with Education Code Section 20953 and formally authorize the necessary income and expenditure appropriations.

Title I funds shall be credited to the general fund of the LEA. Disbursement shall follow accounting procedures prescribed by the *California School Accounting Manual.*[2]

Expenditures shall be classified by functions under the major expenditure classes as defined by the *California School Accounting Manual.*[3] Receipt of Title I funds shall be recorded under income subclass 26, "Federal Income Received from State Sources – Elementary and Secondary Education Act."[4]

3.3.2 Indirect Costs

Federal regulations specify that an indirect cost procedure must be implemented in most federal grant and entitlement programs effective for the fiscal year 1973-74. The California State Department of Education is responsible for developing an indirect cost plan for this state. When the plan is developed, ESEA, Title I, programs are required to conform to indirect cost procedures. Critical to the implementation of the indirect cost procedure is the accurate use of account classifications as specified in the *California School Accounting Manual.*[5]

3.3.3 Identification of Warrant

The Division of Compensatory Education assigns a project number to each project. Each warrant for a Title I expenditure should refer to the project code number. The project code number changes each year and clearly identifies the project of only one LEA for only one year. Invoices for Title I expenditures should be separated from other invoices when they are being processed for purposes of making payment. Sequential grouping of Title I payroll items serves to clarify expenditures and improve budgetary control.

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[2] *California School Accounting Manual* (1971 edition). School Business Administration Publication No. 8. Sacramento: California State Department of Education, 1971.

[3] *Ibid.*, pp. II-1 – II-63.

[4] *Ibid.*, pp. I-2, I-7.

[5] *Ibid.*, pp. II-1 – II-63.

3.3.4 Interest

Interest, if any, earned on deposits of Title I funds need not be returned to the state agency. Every effort is to be made to schedule cash advances in such manner as to allow the LEA to receive only an amount of cash reasonable to meet its Title I project operation obligations.

3.3.5 Final Financial Reports

A final financial report will be submitted for all approved Title I projects. The date for filing this report will be announced by the Division of Compensatory Education. The report is to include the most recently approved budget plus all liquidated expenditures.

If expenditures vary significantly from the approved budget, there will be concern that the project was not executed as described in the approved project application, and an audit exception may be taken.

3.3.6 Audits

Accountants engaged to make audit examinations of school districts receive information from the California State Department of Finance about audit procedures related to Title I projects. The auditors will check to see that the following conditions have been met:

- Adequate accounts and records are maintained.
- Title I funds reach the children in target schools.
- School districts maintain their previous fiscal efforts so that no federal funds are used to supplant local efforts.
- Administrative salaries and other overhead expenses are charged to the Title I project only when such a charge is proper.
- Title I equipment is identified and used as indicated on the approved project application.
- Title I equipment inventories are maintained as required.

While the preceding concerns are primarily the responsibility of school district administrators, they are also subject to review by accountants in their annual audits. The separate accounting of Title I funds shall be included in the regular audit of a school district's fiscal records. Copies of these audits, properly certified, shall be filed with the state agency and may constitute the state audit. Title I audit costs that are additional cost factors to a district are chargeable to the Title I project.

To the extent that reports of local audits are complete and adequate, they may meet the requirements of the federal auditors. However, when such reports are found to be inadequate, local

project expenditure records must be made available to the federal auditors upon request. An audit exception is a determination by an appropriate authority that an item questioned by the auditor is not properly chargeable to the project and must be disallowed. The U.S. Commissioner of Education makes final determination of the allowance or disallowance of items questioned by the auditor.

Any audit exceptions sustained by the state from its own findings or by the U.S. Commissioner of Education from the findings of the federal auditors will constitute an overpayment, and such funds shall be returned to the state agency.

Project activities conducted by an LEA that are found to be contrary to federal regulations,[6] county or district policies, or Government Code provisions[7] and that are identified as audit exceptions will be sustained by the Division of Compensatory Education.

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[6]*Compilation of Legislation on Title I – Financial Assistance to Local Educational Agencies for the Education of Children of Low-Income Families (reflecting the 1966, 1967, and 1970 amendments), Elementary and Secondary Education Act of 1965.* Washington, D.C.: U.S. Department of Health, Education, and Welfare, 1971.

[7]*Government Code: Government of the State.* Sacramento: State Department of General Services, 1969.

4. Special Provisions for Services in Institutional Settings

Many California children receive the services of compensatory education programs in institutions administered by the California Youth Authority, the Department of Corrections, the Department of Mental Hygiene, county institutions serving delinquent children, and public and private agencies that serve neglected children and adjudicated adults.

Inasmuch as the institutional setting differs in many respects from the educational environment in public schools, the following provisions of the guidelines (sections 4.1 through 4.7) are included to ensure optimum success in planning the compensatory education program designed to meet the special educational needs of children served in institutional settings. It should be noted, however, that all other provisions contained in these compensatory education guidelines must be adhered to in the development of a compensatory education program in an institutional setting.

4.1 Project Goal

The main goal of compensatory education programs in institutional settings is the same as that for every Title I project: to raise the academic achievement level of project participants. This level should reflect a normal range and distribution of academic achievement as compared with the performance of the general population of California schoolchildren; that is, those children who are not served by the Department of Mental Hygiene or by institutions administered by county or school district agencies for mentally retarded children.

4.2 Identification of Title I Target Groups

All children served by schools under the jurisdiction of institutions, as described in the introductory paragraph of section 4, are

eligible to receive Title I services. However, the agency receiving the Title I entitlement must restrict the use of Title I funds to providing support for those activities which bear directly on the instructional components.

4.3 Selection of Project Participants

To be eligible for participation in a Title I project administered in an institutional setting, participants must be between the ages of three and twenty-one and must not have completed high school. However, children from birth up to the age of twenty-one who have not completed high school may be identified as project participants in institutions administered by the Department of Mental Hygiene or in local institutions that serve mentally retarded children.

4.4 Required Components of the Compensatory Education Program

4.4.1 Projects Administered by the Department of Mental Hygiene and Local Institutions Serving Mentally Retarded Children

Each proposal shall consist of a minimum of two required components which together compose a comprehensive compensatory education project. These components shall focus on an instructional endeavor designed to reach the main goal of raising the level of pupil achievement and performance. These required components shall be (1) language development; and (2) staff development. Depending on the characteristics of the population served, other components should be considered if appropriate. In any case all supportive components must be related to the two basic components and designed to support them. Examples of supportive components would be those activities that fall under (1) auxiliary services; (2) intergroup relations; (3) parent involvement, and (4) other instructional components such as mathematics or social studies. All identified project participants shall benefit from each of the selected components in accordance with their diagnosed needs.

4.4.2 Projects Administered by the California Youth Authority, the Department of Corrections, and Local Institutions Serving Neglected and Delinquent Children

Each proposal shall consist of five required components which together compose a comprehensive compensatory education project. The Title I project shall focus on an instructional endeavor designed to attain the main goal of raising the pupil achievement level commensurate to that of a normal range and distribution of academic achievement as compared with the general population. A

Title I instructional endeavor shall consist of two basic components: (1) language development; and (2) mathematics. Instructional components may also include other subject areas, such as social sciences and science, after the language development and mathematics components have been developed.

Supportive components must be related to the basic components and designed to support them. Under no circumstances may a supportive component be evaluated solely by itself; it must be evaluated in terms of its effect on instructional components. Supportive components shall consist of the following: (1) auxiliary services; (2) intergroup relations; and (3) staff development. If the institution is located where parent involvement is feasible, a fourth supportive component centering around parent involvement should be considered. All identified project participants shall benefit from each of the five components on an individually diagnosed basis.

4.5 Advisory Committees

As a major means of bringing about the coordination of community resources, as well as the development of relevant institutional compensatory education programs, an advisory committee structure shall be established.

4.5.1 Advisory Committee Membership

The advisory committee membership shall consist of institutional staff, community members, and, where feasible, parents of the project population. Costs for inservice training for members of the advisory committees are legitimate expenses of Title I funds, and provisions for such training should be included in the project budget.

4.5.2 Levels of Advisory Committees

When an agency administers services to children in an institutional setting in various regions of the state, a two-level advisory committee structure shall be established. The applying agency shall establish a regional advisory committee and in addition shall establish advisory committees at each institution administered by the applicant agency.

4.6 Appropriations of Title I Funds for Neglected and Delinquent Children

The appropriation for California under Title I of the Elementary and Secondary Education Act (Public Law 89-10, amended by 89-313, 89-750, and 92-318) is allocated to institutions on the basis of units of average daily attendance from the school year two years prior to the present project year. (See section 3.1.1.)

4.7 Minimum Per-Participant Expenditure

4.7.1 Institutions Administered by the Department of Mental Hygiene, the California Youth Authority, and the Department of Corrections

Because institutions administered by the California Youth Authority, the Department of Mental Hygiene, and the Department of Corrections provide educational services for the total year as opposed to public schools which provide services between the months of September and June, the per-pupil expenditure may vary between $330 and $600, depending on the nature of the educational services. In any case the per-pupil expenditure may not exceed $600.

4.7.2 Programs Administered by Local Agencies for Neglected and Delinquent Children

Inasmuch as institutions serving the needs of neglected children generally send these children to public schools for their educational services, the per-pupil expenditure may be less than $330. However, the level of services may not be below $150 per participant.

Delinquent children who are incarcerated and receive their total educational services in an institutional setting must have Title I per-pupil expenditures of at least $330.

5. Special Provisions for Cooperative Projects

Many California districts with entitlements of $25,000 or less have chosen to participate in cooperative projects in order to coordinate their educational resources to provide a comprehensive compensatory education program for the project population. Inasmuch as many of the cooperative projects take place in rural areas of California, compliance with various sections of the state compensatory education guidelines is not practicable due to substantial distances between districts, mountainous terrain between school districts, and fewer than 60 project participants per school. Such conditions require that special provisions be made to these guidelines when implementing cooperative projects; these provisions are outlined in sections 5.1 through 5.3. It should be noted, however, that all other provisions contained in these guidelines must be adhered to in the development of a compensatory education program in a cooperative project.

It should be noted that references to school districts in these guidelines are to be interpreted as the "cooperative local educational agency (LEA)", i.e., county office or the school district responsible for administering the cooperative project.

5.1 Required Grade Levels for Cooperative Projects

Member districts in a cooperative project which have individual allocations of less than $25,000 have the option of serving only kindergarten through grade three (K-3) pupils in more than one of their eligible elementary schools if funds permit. In this case all eligible K-3 children shall be served in one elementary school before proceeding to the next elementary school.

5.2 Advisory Groups in Cooperative Projects

In the establishment of the advisory structure for cooperative projects (see section 3.1.1-1), the entire project area shall be treated

as one school district. The LEA shall establish one school district advisory committee for the project. Members on the committee shall represent the target areas included in the project. Cooperating school districts will establish target school parent advisory groups in accordance with these guidelines. These groups shall function as do target school parent advisory groups in single district projects.

In cooperative projects where school districts are so widely separated geographically that it is deemed impossible to implement the advisory structure described in these guidelines (see section 1.5.2), deviations from the provisions of these guidelines as are necessary to bring about a functional advisory structure for such cooperative projects may be made through mutual agreement between the administrating LEA and the Division of Compensatory Education. The concurrence of the governing boards of all cooperating school districts or their authorized representatives is required.

5.3 Limitations of Cooperative Memberships

The period of time for cooperative memberships shall be not less than three years for any member district participating in a cooperative Title I project.

(See section 3.1.1-1, Management of Cooperative Projects, for other limitations.)

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